

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**ROBIN ELLIOTT,**

**Plaintiff,**

**v.**

**LINDA WILLIAMS, ET AL.,**

**Defendants.**

**Case No. DKC-08-2159**

**JOINT MOTION FOR ENTRY OF THE PARTIES' STIPULATED ORDER  
TEMPORARILY STAYING ALL ACTIVITY IN THIS ACTION FOR 90 DAYS**

Plaintiff Robin Elliott, and Defendants Linda Williams and Willie Taylor (collectively, "Defendants"), by undersigned counsel, jointly and respectfully request that the Court enter their Stipulated Order, attached hereto as Exhibit 1, that temporarily stays all activity in this action, including discovery, for 90 days pursuant to the terms set forth in that Stipulated Order. The reasons in support of this stay are set forth in the accompanying Memorandum In Support.

Respectfully submitted,

\_\_\_\_\_/s/  
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(signed by Daniel S. Blynn with permission of  
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*Attorney for Plaintiff Robin Elliott*

Dated: July 29, 2010

\_\_\_\_\_/s/  
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*Attorney for Defendants Linda Williams and  
Willie Taylor*

## **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**ROBIN ELLIOTT,**

**Plaintiff,**

**v.**

**LINDA WILLIAMS, ET AL.,**

**Defendants.**

**Case No. DKC-08-2159**

**[PROPOSED] STIPULATED ORDER  
TEMPORARILY STAYING ALL ACTIVITY IN THIS ACTION FOR 90 DAYS**

WHEREAS, the Parties in this action have submitted a Joint Motion and Memorandum In Support thereof requesting that the Court enter this Stipulated Order that temporarily stays all activity in this case for 90 days on terms set forth herein;

WHEREAS, there is good cause for the entry of such temporary stay pursuant to the stipulated terms set forth herein as that stay will facilitate the Parties' ability to reach an out-of-court resolution to this action; will preserve the Court and the Parties' time and resources; and will not prejudice or burden the Court or any of the Parties in any meaningful manner.

NOW THEREFORE, Plaintiff and Defendant stipulate and agree as follows:

- (a) This action is stayed for a period of 90 days commencing from the date that this Stipulated Order is entered by the Court as an order of the Court;
- (b) During the period of such stay:
  - i. all case deadlines are suspended;

- ii. no Party, absent leave of Court, shall file a motion, other than a motion requesting to lift the stay entered by this Stipulated Order; and
  - iii. no Party, absent leave of Court, may serve or conduct any formal discovery with respect to any other Party to this action or third-party, including but not limited to the serving of discovery requests and the noticing or taking of depositions or the serving of subpoenas; and
- (c) this Stipulated Order, as entered by the Court, shall:
- i. be without prejudice to any rights, claims, defenses or arguments that a Party has asserted or may assert in this action;
  - ii. prevent any Party to this action from arguing, on account of the filing of the Joint Motion or the Court's entry of this Stipulated Order, that the other Party to this action has waived any right, claim, defense, or argument that the latter Party had as of the date on which the Parties' Joint Motion was filed; and
  - iii. preserve all rights, claims, defenses, and arguments that each Party has asserted or may have been able to assert in this action as of the date on which the Parties' Joint Motion was filed through the termination of the stay entered pursuant to this Stipulated Order; and
- (d) the Clerk of the Court shall schedule this case for a status conference on the first available date occurring 90 days after the date that this Stipulated Order is entered as an order of the Court and send notice of the date of such status conference to counsel of record for the Parties to this action; and

(e) the Parties, prior to the aforesaid status conference, shall provide the Court with a joint proposed plan and schedule for new deadlines for completion of discovery and dispositive motions in accord with the amount of time remaining to such deadlines under the current scheduling order in this case, as amended, from the date of the filing of the Joint Motion (*e.g.*, one month to complete discovery, because that was the amount of time remaining to complete discovery as of the date of the Joint Motion).

Plaintiff and Defendants, by their undersigned counsel, hereby submit this Stipulation to the Court to be entered as an Order.

WE ASK FOR AND CONSENT TO THIS:

\_\_\_\_\_/s/\_\_\_\_\_  
Daniel S. Blynn (Bar No. 16115)  
(signed by Daniel S. Blynn with permission of  
Rex S. Gordon)  
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*Attorney for Defendants Linda Williams and  
Willie Taylor*

Dated: July 29, 2010

\* \* \* \* \*

Upon consideration of Parties' Joint Motion For Entry of the Parties' Stipulated Order Temporarily Staying All Activity In This Action For 90 Days, the Memorandum In Support thereof, the terms of the Parties' Stipulated Order, the entire record in this case and having found good cause to grant the same, it is this \_\_\_\_ day of \_\_\_\_\_, 2010,

**ORDERED** that the Parties' Joint Motion is granted; and

**IT IS FURTHER ORDERED** that the Court hereby adopts the Parties' Stipulated Order and enters the same as an Order of this Court.

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HONORABLE DEBORAH K. CHASANOW  
UNITED STATES DISTRICT JUDGE